

The FCC document FCC 05-143 (WT Docket No. 05-235), in my opinion is unnecessary and, if these changes are allowed, would damage the amateur radio community and its integrity. Docket No. 05-235 seeks the reduction in qualifications to obtain an amateur radio license. With the additions of new technologies, we should be seeking more technical and operational requirements of licensed amateurs, and not reducing the requirements already in place.

Paragraph 9 says, *the largest group of petitioners requests to eliminate all telegraphy proficiency testing requirements...* I would agree that most petitioners did request the FCC to eliminate telegraphy testing, but I would point out that most of these petitioners are not currently users of the HF spectrum and therefore cannot understand the fragile nature of the HF spectrum. The HF spectrum is extremely limited in available bandwidth and a large growth in users will only serve to increase the problems derived from overcrowding. Nowhere in the FCC 05-143 document offers a plan to increased FCC monitoring and policing. If requirements to use the HF spectrum are going to be changed, only the users of that spectrum should have input on those changes. The current requirements for HF privileges are not unreasonable and are easily obtainable. Those that argue that the current 5 word per minute requirement is too hard or unreasonable are simply lazy or giving in to the political correctness of reducing standards (dumbing down society.)

Paragraph 9 also refers to the Coppola Petition; *...removing the telegraphy examination requirement would further enhance the value of the amateur service to the public as a voluntary non-commercial service, and result in expanding the existing reservoir of trained operators, technicians, and electronic experts within the amateur radio service, pursuing telegraphy proficiency from doing so.* The Coppola Petition seems to indicate that the amateur service is a voluntary public service. Since an amateur radio operator is not required to perform a public service and only a small number of amateur radio operators actually do fulfill a public service role, releasing the telegraphy testing is not likely to have any significant value to encouraging more people to volunteer. If the goal here is to increase the number of volunteers then we should be looking at rule changes that would actually accomplish this, such as, the requirement a licensee must perform a certain number or hours of community service, or extending privileges only during a time of disaster or volunteer service. When providing communications for public service, generally the VHF/UHF spectrum is most often used. Since no telegraphy proficiency testing is required to obtain VHF/UHF licensed privileges, it is not telegraphy proficiency testing that stands in the way of volunteers.

In paragraph 15, the FCC believes the current written examinations are adequate. *We believe that Article 25.6 is satisfied by requiring applicants for an amateur radio operator license to pass written examinations covering relevant subject mater.* The current written examinations are a joke and prove nothing as to an operator's ability to lawfully and technically operate a radio station. The only thing that the

current testing shows is that with enough practice people can memorize answers to questions they do not understand. The telegraphy proficiency test is currently the only requirement that actually requires an amateur radio license applicant to actually learn something. Publishing the amateur radio license test questions shows the lack of commitment to obtain a technically knowledgeable class of operators. To also publish the answers to the question pool shows a complete lack of integrity. People of higher moral standards would call this “cheating”, but in America we call it “Outbased Education.” We need to return the educational process to amateur radio, do away with the published question pool, and do some real testing of both knowledge and ability.

I would also challenge the FCC on their narrow definition of the purpose of Part 97 rules in paragraph 17; *...one of the fundamental purposes underlying Part 97 of the Commission's rules is to accommodate the amateur radio operator's proven ability to contribute to the advancement of the radio art.* Amateur radio operators have a long and proud history of innovation and preparedness in advancing radio communications in some very difficult circumstances; and certainly Part 97 rules allow for this. However, I would like to remind the Commission of another fundamental purpose of Part 97 rules, *Part 97.1(c) Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communications and technical phases of the art.* Currently, Morse code proficiency testing is the only skills testing existing in amateur radio. By removing the only remaining skills testing offered, the FCC will be sending a clear message that skills are not important. It takes more than a clown and a microphone to contribute to the advancement of the radio art, it takes people who are willing to learn difficult curriculum. And that is not to say that 5 words per minute Morse code is difficult, because it most certainly is not. This paragraph goes on to say, *...an individual's ability to demonstrate increased Morse code proficiency is not necessarily indicative of his or her ability to contribute to the advancement of the radio art.* I would contend that the removal of Morse code proficiency testing definitely does not demonstrate ones ability to contribute to the advancement of the radio art. If the FCC and the amateur radio community really believe that amateur radio operators should contribute to the advancement of the radio art and Morse code proficiency testing is not accomplishing this, then replace it with something that will show the applicant's ability to contribute. It is my sincere hope that the Morse code testing not be eliminated until a skills test of equal or greater challenge is substituted.

Because there is no telegraphy requirement to obtain a Technician class amateur radio license, the telegraphy requirement does not discourage individuals from becoming an amateur radio operator as stated in paragraph 18; *...discourages individuals from becoming amateur radio operators.* This paragraph goes on to say, *telegraphy deserves no greater emphasis in the examination system than any other mode of communications.* Should we also stop teaching Shakespeare in literature

classes, about our founding fathers in history classes, and the adding and subtracting of numbers in math classes? No one talks like Shakespeare, who cares who chopped down a cherry tree, and for God sake we have calculators now. All these things are still part of our education process because they teach us who we are, where we came from, and where we are going in the future. Morse code is the most basic form of digital communications and not only is our heritage, but will be an important part in developing our future. Morse code is also one of the few things that make amateur radio operators special. Anyone can pick up a microphone and talk into it, but only a special few can send and receive a message using a key or paddle. I would agree that all modes should have equal representation in the examination system, but this can only happen if we extend the current testing and not by eliminating the testing of difficult modes.

Furthermore, paragraph 18 reads; *...maintaining a telegraphy requirement for the Amateur Extra Class license would not be in the public interest.* What public interest? Who is the public here? What interest? Last time I checked an amateur radio operator who earned an Extra Class license was allowed to operate on frequencies allocated to a General Class operator. Maintaining telegraphy requirements for the Extra Class, and for that matter the General Class, in no way prevents an amateur operator from serving the public. I would contend that by eliminating the telegraphy requirement the FCC would actually be putting public interest in jeopardy. The public interest is better served by an amateur radio operator who is skilled in a communication that can succeed in a high noise and low bandwidth environment. The public's best interest is served by an operator who is willing to learn difficult things rather than one who is going to bellyache about complicated requirements.

Finally, I would like to reemphasize that the only voices that should be heard on the current issue of rule changes to the HF bands are the users of the bands. A no code technician is, in my opinion, not qualified to speak on the rules as pertaining to HF. The majority of the people wanting to eliminate the code are the lazy and those such as the ARRL who seek to profit from amateur radio. If we are going to eliminate Morse code proficiency testing then let us also change the amateur license structure to one class and call it the Citizen Band class.

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